

REMARKS

Upon entry of the present amendment, claims 1-13 will be pending, claims 21-26 having been canceled without prejudice in this paper. Claim 1 has been amended.

Applicants respectfully request an initialed copy of page 1 of the PTO Form 1449 submitted on March 21, 2003, and an initialed copy of the PTO Form 1449 submitted on February 20, 2003.

Applicants appreciate having had the opportunity to discuss the present application with the Examiner during a November 12, 2003 telephone interview. During the interview, U.S. Patent No. 6,312,525 (Bright et al.), the Admitted Prior Art (APA) of Fig. 2 and U.S. Patent No. 4,243,197 (Wright) were discussed.

With regard to Bright et al., Applicants' attorney stated that Bright et al. merely show exemplary semiconductor wafer fabrication equipment (albeit semiconductor wafer fabrication equipment that has a "modular architecture") that could be supported by Applicants' claimed support apparatus; and that such wafer fabrication equipment would have to be supported by some support apparatus during operation (e.g., Applicants' claimed invention, the APA of FIG. 1, the APA of FIG. 2, etc.).

With regard to the APA of FIG. 2 and Wright, Applicants' attorney proposed amending claim 1 to indicate that the frame is "non-rectangular" and includes one or more facilities connection locations that are "pre-aligned to one or more facilities connection points of the semiconductor processing equipment". It was further stated that the APA of FIG. 2 discloses only a rectangular frame with facilities connections that are not pre-aligned; and that Wright discloses only a rectangular frame without facilities connection locations (the drain not actually connecting to

the washing machine or being prealigned to a connection point of the washing machine). The Examiner indicated that she would consider such amendments if a Request for Continued Examination (RCE) were filed. The Examiner also indicated that she believed the term "facilities connection location" might be too broad. No agreement was reached.

Rejection of claims 1, 4, 10, 11, 21, 22 and 25 under 35 U.S.C. 102(e) as being anticipated by Bright et al. and Applicants' traversal thereof

As stated above, Bright et al. merely show exemplary semiconductor wafer fabrication equipment (albeit semiconductor wafer fabrication equipment that has a "modular architecture") that could be supported by Applicants' claimed support apparatus; and that such wafer fabrication equipment would have to be supported by some support apparatus during operation (e.g., Applicants' claimed invention, the APA of FIG. 1, the APA of FIG. 2, etc.). Further, claim 1, as amended, requires:

a non-rectangular frame disposed on the plurality of support legs, the frame having a frame outline which substantially duplicates the bottom outline of the semiconductor processing equipment, the frame being configured to:

support the installation of semiconductor processing equipment by aligning with the plurality of load-bearing mounting feet of the semiconductor processing equipment; and

provide one or more facilities connection locations that are pre-aligned to one or more facilities connection points of the semiconductor processing equipment, the one or more facilities connection locations adapted to pre-align at least one of a vacuum line, a gas supply line and a fluid supply line to the semiconductor processing equipment prior to installation of the semiconductor processing equipment

Applicants respectfully submit that Bright et al. do not disclose a frame adapted to support the installation of

semiconductor processing equipment by aligning with the plurality of load-bearing mounting feet of the semiconductor processing equipment. For example, the modular vacuum system of FIG. 2 of Bright et al. show a plurality of load bearing feet (not numbered) positioned below the platform 26. (Column 5, lines 30-31). However, Bright et al. do not appear to disclose the use of a frame adapted to support the installation of semiconductor processing equipment, such as the modular vacuum system of FIG. 2 of Bright et al., by aligning with the plurality of load-bearing mounting feet of the semiconductor processing equipment as required by claim 1. Bright et al. also do not appear to disclose the further feature of one or more facilities connection locations adapted to pre-align at least one of a vacuum line, a gas supply line and a fluid supply line to the semiconductor processing equipment prior to installation of the semiconductor processing equipment as also required by claim 1. For at least these reasons, Applicants respectfully submit that claim 1 is allowable over Bright et al. Claims 4, 10 and 11 depend on claim 1 and are submitted as patentable for at least the same reasons.

Rejection of claims 1-5 and 7-11 under 35 U.S.C. 103(a) as being unpatentable over the APA of FIG. 2 in view of the APA of FIG. 1 and further in view of Wright and Applicants' traversal thereof

With regard to the APA of FIG. 2 and Wright, claim 1 has been amended to indicate that the frame is "non-rectangular" and to include one or more facilities connection locations that are "pre-aligned to one or more facilities connection points of the semiconductor processing equipment". However, the APA of FIG. 2 discloses only a rectangular frame with facilities connections that are not pre-aligned; and Wright discloses only a rectangular frame without facilities

connection locations (the drain not actually connecting to the washing machine or being prealigned to a connection point of the washing machine). The APA of FIG. 1 similarly provides no such disclosure. Accordingly, even if motivation existed to combine the APA of FIG. 1 and the APA of FIG. 2 (Applicants respectfully submit there is none given that the APA of FIG. 2 is a standard) or to combine the APA of FIG. 2 with Wright (Applicants respectfully submit there is none given that Wright is non-analogous art), such a combination would not read on amended claim 1. Accordingly, claim 1 and claims 2-5 and 7-11 are submitted as patentable for at least this reason.

The remaining prior art references relied on for the rejections of claims 2, 5, 6, 12 and 13 (e.g., U.S. Patent No. 5,107,775 (Langlais et al.), Bright et al., U.S. Patent No. 4,480,656 (Johnson) and U.S. Patent No. 2,197,598 (Way)) do not overcome the above deficiencies with regard to claim 1. As such, claims 2, 5, 6, 12 and 13 are submitted as patentable at least based on their dependency on amended claim 1.

In view of the foregoing, all pending claims are believed to be allowable, and passage to issue is respectfully requested.

A separate Request for a Three-Month Extension of Time and authorization to charge the requisite fee to deposit account no. 04-1696 are enclosed herewith. Applicants do not believe any other fees are due regarding this amendment. If any additional fees are required, however, please charge Deposit Account No. 04-1696.

Applicants encourage the Examiner to telephone Applicants' attorney to discuss the amendment should any issues remain.

Respectfully submitted,



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